

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

**Latasha Holloway, *et al.*,**

**Plaintiffs,**

**v.**

**City of Virginia Beach, *et al.*,**

**Defendants**

**Civil Action No. 2:18-cv-0069**

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**PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

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**PLAINTIFFS' EXHIBIT 19**  
Deposition Transcript of Plaintiff Latasha Holloway

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

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LATASHA HOLLOWAY and GEORGIA ALLEN,

Plaintiffs,

CIVIL ACTION NO.  
2:18-cv-00069

v.

CITY OF VIRGINIA BEACH, et al.,

Defendants.  
-----

DEPOSITION UPON ORAL EXAMINATION  
OF LATASHA M. HOLLOWAY,  
TAKEN ON BEHALF OF THE DEFENDANTS

Virginia Beach, Virginia

September 12, 2019

Appearances:

CAMPAIGN LEGAL CENTER

By: ANNABELLE HARLESS, ESQUIRE  
ERIN CHLOPAK, ESQUIRE  
Counsel for the Plaintiffs

OFFICE OF THE VIRGINIA BEACH CITY ATTORNEY

By: CHRISTOPHER S. BOYNTON, ESQUIRE  
GERALD L. HARRIS, ESQUIRE  
JOSEPH KURT, ESQUIRE  
Counsel for the Defendants

## I N D E X

DEPONENT	EXAMINATION BY	PAGE
LATASHA M. HOLLOWAY	Mr. Harris	3

## EXHIBITS

NO.	DESCRIPTION	PAGE
1	Renewed Motion for Appointment of Counsel	7
2	Appendix A, Virginia Beach, VA map	12

1                   Deposition upon oral examination of  
2   LATASHA M. HOLLOWAY, taken on behalf of the  
3   Defendants before Juanita Harris Schar, CCR, RMR,  
4   CRR, a Notary Public for the Commonwealth of  
5   Virginia at large, commencing at 2:04 p.m. on  
6   September 12, 2019, at the Office of the Virginia  
7   Beach City Attorney, Building 1, 2401 Courthouse  
8   Drive, Virginia Beach, Virginia; and this in  
9   accordance with the Federal Rules of Civil  
10   Procedure.

11                   - - - - -

12                   LATASHA M. HOLLOWAY, was sworn and  
13   deposed on behalf of the Defendants as follows:

14                   EXAMINATION

15   BY MR. HARRIS:

16           Q.     You are Ms. Latasha Holloway?

17           A.     Yes.

18           Q.     Ms. Holloway, my name is Jerry Harris.

19   I'm here with Christopher Boynton and Joseph Kurt.  
20   We all represent the City of Virginia Beach and the  
21   other named defendants in this case. The purpose of  
22   your appearance here today is for your deposition.  
23   Have you been involved in a deposition before?

24           A.     Not to my knowledge.

25           Q.     What I'm going to recommend is we go by

1 a few guidelines that I find in my experience help  
2 us get through our time together more efficiently.  
3 That being the case, the way things will go today is  
4 I will ask a question. I'll ask you to allow me to  
5 complete my question, at which time I'll allow you  
6 to give a complete answer.

7 Inevitably, as was the case this  
8 morning, I will inadvertently interrupt you and you  
9 may inadvertently interrupt me, but the reason we  
10 try to stick to that is so the court reporter can  
11 take down everything as a question followed by an  
12 answer.

13 As part of your answers, I will ask you  
14 to respond verbally. That is not a shake of the  
15 head yes or no. Uh-huh or uh-uh are difficult to  
16 discern on a transcript. Therefore, I will ask you  
17 to respond verbally to my questions.

18 I'm going to assume now that you've been  
19 placed under oath you're giving all your answers  
20 truthfully. And I'm also going to assume that  
21 they're to the best of your ability based on the  
22 information you have presently.

23 The other thing is I'm going to assume  
24 that you've understood my question as I've asked it.

25 As is my habit, I will not always ask a

1 perfect question. I think I confirmed in the  
2 deposition earlier this morning that my streak of  
3 100 percent remains intact, but to the extent you  
4 don't understand my question or need clarification,  
5 please ask for it and I'll try and clarify my  
6 question as best I'm able.

7 If at some point your attorney objects,  
8 allow her to state her objection and then we'll  
9 proceed from there.

10 As a matter of personal convenience to  
11 you, if at any point you need to take a break, if we  
12 go for a period of time and you need to get water,  
13 stretch your legs, use the restroom, let me know and  
14 we'll allow you to take that break. The only thing  
15 I will ask is that if we are in the middle of a  
16 question, that we finish that question and then  
17 we'll go ahead and take the break.

18 All of that together, does that seem  
19 reasonable or fair to you today?

20 A. Yes.

21 Q. I'm going to ask you again to state your  
22 full name for the record.

23 A. Latasha Michelle Holloway.

24 Q. And you are the Latasha Michelle  
25 Holloway named as plaintiff in the case of Latasha

1 Holloway and Georgia Allen versus City of Virginia  
2 Beach and other defendants now pending in the United  
3 States District Court for the Eastern District of  
4 Virginia; is that correct?

5 A. Yes.

6 Q. For the record, that case bears  
7 No. 2:18-cv-69.

8 Ms. Holloway, what is your current  
9 occupation?

10 A. Unemployed.

11 Q. Ms. Holloway, I'm going to show you a  
12 document that appears was filed by you as a pro se  
13 litigant, also in the Eastern District of Virginia.  
14 That bears Case No. 2:19-cv-104.

15 I have a copy for you to review for as  
16 long as you'd like and a copy for your counsel.

17 MS. HARLESS: Thank you. I just will  
18 make it clear on the record that we do not represent  
19 her in that case. We only represent her in this  
20 present lawsuit.

21 BY MR. HARRIS:

22 Q. And, Ms. Holloway, once you've had a  
23 chance to flip through that, I'm going to focus your  
24 attention on the last page.

25 MS. HARLESS: Has this been marked as an

1 exhibit? Sorry.

2 MR. HARRIS: Not yet.

3 A. Okay.

4 BY MR. HARRIS:

5 Q. Do you recognize that document?

6 A. I believe so.

7 MR. HARRIS: If we could have that  
8 marked.

9 (Holloway Exhibit No. 1 was marked for  
10 identification.)

11 BY MR. HARRIS:

12 Q. Ms. Holloway, I'm going to point your  
13 attention to page 1 of Holloway Exhibit No. 1. This  
14 appears to be a renewed motion for appointment of  
15 counsel filed by you in the federal court for the  
16 Eastern District of Virginia, Richmond Division.

17 Would you agree with that?

18 A. To the best of my knowledge.

19 Q. Is there a particular reason you can't  
20 recall filing that with the federal court?

21 A. I -- I said to the best of my knowledge.  
22 I'm agreeing with what you expressed.

23 Q. So your recollection is that you did  
24 file this document on August 23rd, 2019, in the  
25 federal court?



1           A.     Yes.

2           Q.     I want to turn your attention now,  
3     ma'am, to page 7 of 7 of that document.

4           A.     You said 7?

5           Q.     7 of 7, yes, ma'am. The last page,  
6     please.

7                     MR. BOYNTON: Also known as the last  
8     page.

9     BY MR. HARRIS:

10          Q.     Ms. Holloway, before I ask you any  
11     further questions, I want to assure you that I do  
12     not need the details of the admittance here. The  
13     reason for me bringing this to your attention is I  
14     need to make sure that you are not under the  
15     influence of any medications which may impair your  
16     ability to understand my questions today.

17          A.     No.

18          Q.     Are you under the influence of any  
19     medications which may impair your ability to answer  
20     my questions truthfully today?

21          A.     No.

22          Q.     Despite having this now brought to your  
23     attention, you feel prepared and competent to  
24     testify at your deposition today?

25                     MS. HARLESS: Objection to form.

1                   You can answer.

2                   A.     As far as I'm concerned.

3 BY MR. HARRIS:

4                   Q.     Ms. Holloway, you mentioned that you  
5 were currently unemployed. How long have you been  
6 unemployed?

7                   A.     For years.

8                   Q.     "For years" as in four years total or  
9 for many years?

10                  A.     For many years.

11                  Q.     Approximately how many?

12                  A.     Approximately nine.

13                  Q.     Prior to your nine-year unemployment,  
14 how were you employed?

15                  A.     I -- I don't remember the name of where  
16 I worked, but I was employed at one time.

17                  Q.     What type of work was it?

18                  A.     I went to school. It was like  
19 counseling.

20                  Q.     That would have been around 2010, if my  
21 math is correct?

22                  A.     I honestly don't recall. But  
23 approximately. I'm...

24                  Q.     I don't need a definite date. Just an  
25 approximation.

1                   You mentioned school. Where did you go  
2 to school?

3           A.     Norfolk State.

4           Q.     What did you study while you were at  
5 Norfolk State?

6           A.     Psychology.

7           Q.     And did you graduate with a bachelor's  
8 degree?

9           A.     Yes.

10          Q.     Did you ever seek any degree beyond the  
11 bachelor's degree?

12          A.     Yes.

13          Q.     Which degree was that?

14          A.     Master's degree.

15          Q.     Also from Norfolk State or somewhere  
16 else?

17          A.     No, somewhere else.

18          Q.     Where was that?

19          A.     American Intercontinental University.

20          Q.     What master's degree were you seeking  
21 there?

22          A.     Business administration.

23          Q.     And did you achieve that master's  
24 degree?

25          A.     Yes.

1 Q. When was that?

2 A. I'm not sure of the year. I don't  
3 recall the year. But I did finish.

4 Q. Any roundabout time frame generally when  
5 this happened?

6 A. Approximately 2001-ish. But then I'm  
7 not sure.

8 Q. This period, nine-year period of  
9 unemployment was not related to you being enrolled  
10 in Norfolk State or -- I abbreviated it to AIU. I  
11 forgot the full name of it already. What was the  
12 full name?

13 A. American Intercontinental.

14 Q. Your enrollment in those schools is  
15 unrelated to your unemployment for the last nine  
16 years? Is that right?

17 MS. HARLESS: Objection, relevance.

18 You can answer the question.

19 A. I don't know what you mean by that  
20 question.

21 BY MR. HARRIS:

22 Q. I'm trying to make clear that you  
23 haven't been in either of these institutions for the  
24 last year -- nine years. I'm sorry.

25 A. Not to my knowledge, no.

1 Q. What is your current residential  
2 address?

3 A. 819 Tuition Court, Virginia Beach,  
4 Virginia, 23 -- 23462.

5 Q. How long have you lived at that address?

6 A. For a year now.

7 Q. So since approximately last September  
8 you've lived at that address?

9 A. Yes.

10 Q. Where did you live prior to that  
11 address?

12 A. 3683 Windmill Drive.

13 Q. Is that in the City of Virginia Beach?

14 A. Yes.

15 Q. Approximately how long did you live at  
16 the Windmill Drive address?

17 A. A few years.

18 Q. At the 819 Tuition Court address where  
19 you said you've lived for the last year, who else  
20 lives with you at that address?

21 A. My four children.

22 Q. Anyone else living in the home?

23 A. No.

24 (Holloway Exhibit No. 2 was marked for  
25 identification.)

1 BY MR. HARRIS:

2 Q. Ms. Holloway, I'm going to show you  
3 what's been marked as Exhibit No. 2 for your  
4 deposition today, with copies to counsel.

5 If you would take a look at Exhibit 2,  
6 do you recognize that document for any reason?

7 A. I do not recall.

8 Q. You don't recall ever seeing that  
9 document?

10 A. No.

11 Q. How long have you lived in the City of  
12 Virginia Beach? Total.

13 A. Let's see. Probably the majority of my  
14 life so I was trying to think of -- a majority of my  
15 life I've lived in Virginia Beach.

16 Q. My mother always taught me it was very  
17 rude to ask a woman her age, so can you tell me what  
18 that number is for you?

19 A. That would be 41.

20 Q. So a majority of your adult life you've  
21 lived in the City of Virginia Beach?

22 A. Yes.

23 Q. Yes, ma'am. Thank you.

24 I'm going to ask you to look at that  
25 map. And admittedly, it's quite small. I should

1 ask, you don't have any seeing impairments that  
2 prohibit you from seeing that map?

3 A. It is very small and you barely can  
4 recognize what you're asking me to really look at.

5 Q. This is Appendix A from the amended  
6 complaint that was filed in this case.

7 A. Okay.

8 Q. It has -- in the top left corner where  
9 you'll see a yellow shaded area there are two stars.  
10 Do you see those two stars in the top left?

11 A. I do not see -- okay. I think I -- I'm  
12 making out what you're referring to, I think.

13 MR. HARRIS: With counsel's permission,  
14 I'll point the witness in that direction.

15 MS. HARLESS: Yeah.

16 BY MR. HARRIS:

17 Q. I'm referring to these as red stars  
18 (indicating).

19 A. Okay.

20 Q. The furthest top left and then  
21 immediately to its right as you look at the map is  
22 another red star.

23 A. Uh-huh.

24 Q. Do you recognize either of those red  
25 stars as being in the approximate location of 819

1 Tuition Court?

2 MS. HARLESS: Objection, calls for  
3 speculation.

4 A. I'm sorry. I can't make out anything on  
5 here.

6 BY MR. HARRIS:

7 Q. I'll refer you back to what was  
8 previously marked as an exhibit in Ms. Georgia  
9 Allen's deposition that was held this morning. I  
10 will offer to you this is a larger version of the  
11 same map and ask you to take a look at it and see if  
12 that helps.

13 A. Okay. What was your question?

14 Q. My question is, can you identify one of  
15 those red stars as being in the general area of 819  
16 Tuition Court in Virginia Beach?

17 MS. HARLESS: Objection, calls for  
18 speculation.

19 You can answer.

20 A. Again, I'm not familiar -- there's a  
21 star that's circled here, but I don't know...

22 BY MR. HARRIS:

23 Q. So your testimony is as you view that  
24 map now, you're not able to identify if one of those  
25 two stars is near where you're currently living at



1 819 Tuition Court?

2 A. Well, there -- there is -- I can make  
3 out a street name here.

4 Q. Which street is that, ma'am?

5 A. And that is Baker Road. But I don't  
6 know in proximity to the address that you're asking  
7 for where that would be on here.

8 Q. Well, I'm asking about 819 Tuition  
9 Court, your --

10 A. Right.

11 Q. -- residential address.

12 Which neighborhood is that?

13 A. That's what I'm saying. I don't know  
14 using this particular map because it's using a  
15 street that is rather long, and in proximity to 819,  
16 I don't know where it would fall. So you're asking  
17 if one of the -- the stars is in approximation, and  
18 I truthfully can't give you a response.

19 Q. Let me ask you without referencing the  
20 map, what neighborhood do you live in?

21 A. That would be -- it's called Campus  
22 East.

23 Q. Do you know in what general area of the  
24 City of Virginia Beach Campus East is?

25 A. It is located off of Baker Road. But

1 Baker Road is rather long.

2 Q. You'll see there is one star near Baker  
3 Road and the other star is not near Baker Road. Is  
4 that correct?

5 A. You mean the star that is circled?

6 Q. Yes, ma'am.

7 A. Okay. It -- as far as this map is  
8 concerned, it does not appear to be near Baker Road.  
9 No.

10 Q. What would you say is the nearest cross-  
11 street to Tuition Court?

12 A. It would be Baker Road and Campus.

13 Q. This 819 Tuition Court address, have you  
14 been living there continuously for the last year?

15 A. Yes.

16 Q. And you had mentioned that for a few  
17 years before you had been living at 3683 Windmill  
18 Drive in Virginia Beach; is that correct?

19 A. Yes.

20 Q. Did you live continuously at Windmill  
21 Drive for those number of years?

22 A. Yes.

23 Q. Where is Windmill Drive located? What  
24 neighborhood, I should say.

25 A. It -- Windmill Drive, oh, gosh. You're

1 asking what neighborhood?

2 Q. Yes, ma'am.

3 A. I believe it's Green Run.

4 Q. I'll ask you the same question in  
5 relation to Tuition Court. What's the nearest major  
6 cross-street to the Windmill Drive address?

7 A. Rosemont Road and Dahlia. And again,  
8 all this is to the best of my knowledge.

9 Q. Do you know which voting district you're  
10 in for 819 Tuition Court?

11 A. You mean where -- where -- are you  
12 asking where do I vote?

13 Q. I'm asking you which district you're in.

14 A. Oh, for the -- I believe the second.

15 MR. BOYNTON: City Council district, not  
16 congressional.

17 A. Oh.

18 MR. BOYNTON: Sorry. I'm helping him.

19 A. Oh, no, I'm not --

20 MS. HARLESS: There's no question  
21 pending.

22 MR. BOYNTON: I'm sorry. I'm talking  
23 with counsel. I didn't mean to throw you off.

24 BY MR. HARRIS:

25 Q. My more appropriate question, I should

1 say, is, are you aware of which City Council  
2 district you live in?

3 A. I -- I don't recall off the top of my  
4 head now, no.

5 Q. Are you registered to vote in Virginia  
6 Beach?

7 A. Yes.

8 Q. In the last four years have you ever  
9 lived anywhere other than the Windmill Drive and  
10 Tuiton Court address?

11 A. I don't recall definite -- a definite  
12 response. So I guess I'll say I -- I don't recall.  
13 To give a definite.

14 Q. Are there any other addresses then that  
15 you can think of where you may have lived?

16 A. In --

17 Q. In the last four years, other than  
18 Windmill Drive and Tuiton Court.

19 A. Yes. We were homeless for some time.

20 Q. When were you homeless?

21 A. I don't recall. I'm sorry. I can tell  
22 you that we were homeless. And I don't recall  
23 dates.

24 Q. You've been homeless in the last four  
25 years?

1 A. Yes.

2 Q. How many times?

3 A. A couple of times.

4 Q. Do you count that as two?

5 A. Yes.

6 Q. And you have no recollection of when in  
7 that last four-year period those two spats of  
8 homelessness occurred?

9 A. Right now I just don't recall. I'm  
10 sorry.

11 Q. Did you become homeless while you were  
12 living at the Windmill Drive address?

13 A. Well, as a direct result of some of the  
14 apartheid, oppressive behaviors of the City, I was  
15 not afforded housing opportunities. So yes. The  
16 answer to that would be yes.

17 Q. So that you became homeless while you  
18 were living at 3683 Windmill Drive?

19 A. Yes. After living there. So I was  
20 actually placed there through a homeless program,  
21 and, unfortunately, was abandoned. And there was  
22 another point where we became homeless, displaced  
23 again.

24 Q. Because of the condition of 3683  
25 Windmill Drive?

1 MS. HARLESS: Objection,  
2 mischaracterizes the testimony.

3 BY MR. HARRIS:

4 Q. I'm trying to understand how you became  
5 homeless at 3683 Windmill Drive.

6 A. It was a direct result of my challenging  
7 the City about the treatment of minorities,  
8 including my family, and it was retaliation.

9 Q. By who?

10 A. The City of Virginia Beach.

11 Q. I'm asking for particular people or  
12 names.

13 A. I don't have specific names off the top  
14 of my head. I can only speak to my experience, and  
15 that's what happened.

16 Q. It is your testimony today that your  
17 homelessness resulted from the retaliation of these  
18 unnamed individuals?

19 MS. HARLESS: Objection, asked and  
20 answered. Argumentative.

21 BY MR. HARRIS:

22 Q. You can answer the question.

23 A. Yes.

24 Q. Was that the only time you became  
25 homeless at 3683 Windmill Drive?

1 A. To my knowledge.

2 Q. Wouldn't you remember if you became  
3 homeless another time at 3683 Windmill Drive?

4 MS. HARLESS: Objection, argumentative.

5 MR. HARRIS: It's not a proper objection  
6 in this deposition. Please stop doing that.

7 MS. HARLESS: Sir, it is a proper  
8 objection in this deposition. Don't ask an  
9 argumentative question.

10 BY MR. HARRIS:

11 Q. Ma'am, you can answer the question.

12 A. What was the question? I'm sorry.

13 Q. The question is, do you remember any --  
14 wouldn't you remember any other time that you became  
15 homeless while living at 3683 Windmill Drive?

16 A. I'm giving my responses to the best of  
17 my recollection.

18 Q. You recall becoming homeless at 819  
19 Tuition Court?

20 A. We've experienced some struggles as a  
21 direct result, again, but for the most part, I --  
22 I'm hanging in there.

23 Q. Ma'am, my question is did you become  
24 homeless while you were living at 819 Tuition Court.

25 MS. HARLESS: Objection, asked and

1     answered.

2                   MR. HARRIS:  It has not been asked and  
3     answered.

4                   MS. HARLESS:  You just asked it.  She  
5     gave you an answer.

6                   MR. BOYNTON:  It wasn't answered.

7                   MS. HARLESS:  She did.

8                   MR. HARRIS:  Are you instructing her not  
9     to answer?

10                  MS. HARLESS:  No, but I'm perfectly able  
11     to place an objection on the record.

12                  MR. HARRIS:  Asked and answered is not a  
13     proper objection at a federal deposition.  Asked and  
14     answered informs the witness that they should be  
15     giving the same answer that they did to the last  
16     question.  Your objections under the rules should be  
17     specific, and asked and answered is not a proper  
18     objection.  It's the equivalent of a speaking  
19     objection.

20                  MS. HARLESS:  It's not.

21                  MR. HARRIS:  You're coaching the  
22     witness.

23                  MS. HARLESS:  It's a proper -- I'm not  
24     coaching the witness.  You're asking the same  
25     question multiple times.



1 BY MR. HARRIS:

2 Q. Ma'am, I'm asking you whether you recall  
3 becoming homeless at 819 Tuition Court. While you  
4 were living there in the last year.

5 A. I'm stating my experiences for the  
6 record. And to the best of my knowledge, every  
7 answer that I'm giving you is what I've experienced.

8 Q. The answer you just gave me does not  
9 include an answer to my question. Which is, do you  
10 recall in the last year becoming homeless while  
11 living at 819 Tuition Court, 23462?

12 A. What I expressed earlier was that, you  
13 know, we have been struggling as a result of the  
14 same oppressive activities that we experienced from  
15 the City as we've lived at 819. And I have -- I am  
16 still in need of supports. So that's why I answered  
17 the -- the way that I did, because I said we're  
18 hanging in there. And so that was my response to  
19 your question.

20 Q. I understand the answer to your question  
21 then to be no, you have not been displaced from your  
22 home in the last year at 819 Tuition Court, 23462.  
23 Am I incorrect in my assumption?

24 A. To the best of my knowledge.

25 Q. To the best of your knowledge what?

1           A.     You just made a statement. And I  
2     responded to the best of my knowledge.

3           Q.     Ms. Holloway, I'm asking you -- let me  
4     state it a different way. Would you agree with the  
5     statement that you have not been homeless in the  
6     last year?

7           A.     Yes.

8           Q.     Have you ever lived outside of Virginia  
9     Beach?

10          A.     Yes.

11          Q.     When was that?

12          A.     Oh, gosh. When I was in college.  
13     Again, I don't want to give you wrong answers so I  
14     don't -- I don't know the specific dates, but that's  
15     the best I can do.

16          Q.     Where did you live when you were in  
17     college?

18          A.     I lived in Norfolk where my -- my  
19     college is.

20          Q.     Have you ever lived in Portsmouth?

21          A.     We did live in -- yes.

22          Q.     When did you live in Portsmouth, ma'am?

23          A.     Oh, gosh. Again, I don't remember  
24     specific dates. It was a number of years ago,  
25     though.

1 Q. Prior to the four years that we've been  
2 referring to as the Windmill Drive and Tuition Court  
3 address?

4 A. Yes.

5 Q. You have not been living in Portsmouth  
6 in the last four years?

7 A. No.

8 Q. Do you run a business in Portsmouth?

9 A. No.

10 Q. Have you ever lived in Newport News?

11 A. Not to my recollection, no.

12 Q. Do you have any family ties to Newport  
13 News?

14 A. I am -- I don't know. I may. I don't  
15 know.

16 Q. To the best of your knowledge, you don't  
17 have any family ties to Newport News?

18 MS. HARLESS: Objection, asked and  
19 answered.

20 BY MR. HARRIS:

21 Q. You can answer.

22 A. I really don't know. I may, but I don't  
23 know.

24 Q. In Norfolk did you ever live at 509 West  
25 35th Street?

1           A.     I don't recall that address.

2           Q.     Did you ever live at 860 West 35th  
3 Street?

4           A.     Yes. I recall that address.

5           Q.     What was that address?

6           A.     The one you just said?

7           Q.     I'm saying what -- why do you recall  
8 that address, 860 West 35th Street?

9           A.     You just -- you asked me if I lived  
10 there, and I said yes, I recall that address.

11          Q.     When did you live there?

12          A.     Oh, gosh. I don't recall. I believe --  
13 I don't want to say anything wrong, but I don't  
14 recall.

15          Q.     Have you ever lived at 3776 Summer Place  
16 in Virginia Beach, Virginia?

17          A.     Yes. That sounds familiar.

18          Q.     Do you recall when you lived at that  
19 address?

20          A.     Oh gosh, I'm so sorry. It -- it was  
21 years ago, but I don't recall the year.

22          Q.     Did you ever live at 3036 Barberry Lane  
23 in Virginia Beach?

24          A.     Yes.

25          Q.     When did you live at that address?

1           A.     When I was a child.

2           Q.     What about the address 4913 Erskin,  
3     E-R-S-K-I-N, Street in Virginia Beach?

4           A.     Yes. That sounds familiar, but again, I  
5     don't remember the years and the order.

6           Q.     Did you ever live at 312 West 26th  
7     Street in Norfolk?

8           A.     What was it again?

9           Q.     312 West 26th Street in Norfolk.

10          A.     I don't recall that address.

11          Q.     Did you ever live at 847 Spence Circle  
12     in Virginia Beach?

13          A.     I believe so.

14          Q.     Did you ever live at 121 Wilcox Avenue  
15     in Portsmouth, Virginia?

16          A.     I believe so.

17          Q.     Do you recall when that was?

18          A.     I do not. I'm sorry.

19          Q.     As of 2009 did you consider yourself a  
20     resident of Virginia Beach or of Norfolk?

21          A.     I don't recall where I was at that time.  
22     I don't know.

23          Q.     Is it fair to say it could have been  
24     either Virginia Beach or Norfolk at that time?

25          A.     I don't recall.

1           Q.     Ms. Holloway, I want to talk about your  
2     initial involvement as a plaintiff in this case. It  
3     would be correct to say that you filed this case pro  
4     se, or by yourself, initially; is that correct?

5           A.     Yes.

6           Q.     And I should clarify in this avenue of  
7     questions or these series of questions I am not  
8     asking you any -- to tell me about any discussions  
9     you've had with the Campaign Legal Center or any of  
10    their attorneys. I am interested to know, when you  
11    initially filed this lawsuit as a plaintiff, did you  
12    have assistance or support from other members of the  
13    African American community in that filing?

14          A.     What do you mean?

15          Q.     Did people support you in that filing or  
16    did people help you write it?

17          A.     You mean -- I mean what -- what -- who  
18    are you referring to as people?

19          Q.     Anyone.

20          A.     I did seek legal supports.

21          Q.     I don't want to ask for any conversation  
22    you had with counsel. I'm asking for individual  
23    citizens, so let me rephrase my question. When you  
24    were initially involved in this lawsuit by filing  
25    the pro se complaint, did you have support from

1 other members of the African American community,  
2 excluding legal counsel?

3 A. Not to my knowledge.

4 Q. Did you have any assistance -- well, of  
5 course, excluding legal counsel, from any members of  
6 the Asian American community?

7 A. Not to my knowledge.

8 Q. Did you have any assistance, excluding  
9 counsel, from the members of the Hispanic American  
10 community?

11 A. Not to my knowledge.

12 Q. Were there any organizations that  
13 assisted you or supported you in your filing of the  
14 initial complaint?

15 A. I sought legal counsel.

16 Q. Did you receive any assistance from the  
17 United Front for Justice?

18 A. Not to my knowledge.

19 Q. Did you receive any assistance from an  
20 individual by the name of Roy Perry-Bey?

21 A. Not to -- not -- he's a personal friend  
22 of mine, so...

23 Q. Excluding conversations with counsel,  
24 when did you become first involved with Ms. Georgia  
25 Allen? Relating to this lawsuit.

1 A. Are you asking for a date?

2 Q. Let me ask first how it happened. I  
3 don't need the date.

4 A. I have met Ms. Allen casually and that  
5 was about it. I really didn't have a lot of  
6 interaction with her.

7 Q. Excluding conversations with counsel, do  
8 you know how she became involved as a co-plaintiff  
9 in this case?

10 A. Well, I have been just talking to any  
11 and everyone that I can regarding this case, and  
12 when I expressed to her what I was doing, she was  
13 interested in helping.

14 Q. You used the phrase anyone and everyone  
15 and then also mentioned Ms. Allen. Do you recall  
16 any other people by name that you may have spoke to?

17 A. I don't recall any particular names,  
18 unfortunately.

19 Q. Do you keep a diary or a register or  
20 daily calendar?

21 A. No.

22 Q. Is there anywhere where these names  
23 would be recorded that you could go back and refresh  
24 your memory?

25 A. Not to my knowledge.



1 Q. Do you recall seeking the support of the  
2 Virginia Beach chapter of the NAACP for this  
3 lawsuit?

4 A. That is where I met Ms. Allen.

5 Q. Do you recall approximately when you  
6 sought the assistance of NAACP?

7 A. Several years ago.

8 Q. Had you already filed the initial  
9 complaint?

10 A. Yes. I believe so.

11 Q. Had you been involved with the NAACP  
12 before?

13 A. Not really.

14 Q. Had you been involved in any civil  
15 rights activism groups?

16 A. Not groups. No.

17 Q. Help me understand that clarification.  
18 When you say "not groups," was it something else?

19 A. No. I -- you know, I'm an African  
20 American in the City of Virginia Beach so I very  
21 much have been outspoken about the treatment of  
22 minorities within the city. Myself.

23 Q. Have you ever been involved with a group  
24 similar to the NAACP that pursues civic causes or  
25 other criminal justice reform-type measures?

1 A. Not to my knowledge. No.

2 Q. Have you ever been involved with any  
3 Asian American groups in Virginia Beach?

4 A. No.

5 Q. Have you ever been involved with any  
6 Hispanic American groups in Virginia Beach?

7 A. No. Not to my knowledge.

8 Q. When you spoke or went to the NAACP did  
9 you also raise with them the concerns you had  
10 regarding your other federal lawsuit relating to  
11 your son?

12 A. Yes.

13 Q. Did you talk to Ms. Georgia Allen about  
14 both of those lawsuits?

15 A. No. I -- I didn't talk specifically  
16 about any lawsuit. I spoke in general about what's  
17 been going on within the city, the dynamics within  
18 the city, and the apartheid system that's oppressed  
19 minorities within the city.

20 Q. When you went to the NAACP and you met  
21 Ms. Allen for the first time, is it your testimony  
22 that you did not discuss the complaint that you had  
23 filed related to the Voting Rights Act?

24 A. That's what I -- I just said.

25 Q. Is that also your testimony then that

1     you did not discuss with Ms. Allen when you went to  
2     the NAACP that -- excuse me. Is it also your  
3     testimony that you did not discuss your case  
4     relating to your son with Ms. Allen when you first  
5     went to the NAACP?

6             A.     No, the purpose was to -- to find  
7     counsel. So that was the -- what we were  
8     discussing. For her to just help with that.

9             Q.     Help you find counsel for the lawsuits,  
10    I assume, right?

11            A.     For -- yes, at that time.

12            Q.     So I'm having difficulty understanding  
13    how you could have a conversation about needing  
14    counsel for the lawsuits but not also discuss the  
15    lawsuits themselves.

16            A.     Because I didn't have anything to  
17    present. We didn't have like a sit-down discussion  
18    specifically about what was going on. It was in  
19    very general, you know, Hey, is this the NAACP  
20    building? You know. Yes, welcome. Come on in.

21            Q.     And I'm sorry. I think I asked you this  
22    question already, but how many years did you say  
23    approximately you've been living in the City of  
24    Virginia Beach?

25            A.     Most of my -- my life.

1 Q. That's right. You said the majority of  
2 your adult life.

3 A. Right.

4 Q. Are you aware of efforts within the  
5 African American community to change to a district  
6 or a ward system within the City of Virginia Beach?  
7 Historically.

8 A. I am only aware of my efforts. I can't  
9 speak to anyone else's.

10 Q. You've used the phrase "apartheid  
11 system" twice in this deposition so far. Can you  
12 give me a description or detail of what you mean  
13 when you say that?

14 A. It is a system where nonwhites are not  
15 afforded the same opportunities within the city as  
16 whites.

17 Q. Can you give me some examples?

18 A. A great example would be the one that  
19 I've already provided with my housing. And me  
20 having been found eligible as a homeless individual  
21 for housing, I was subjected to discrimination and  
22 denied that opportunity for no other reason but for  
23 being a minority.

24 Q. You've said a lot there in one sentence  
25 so I'm going to move back to you were homeless

1 before the time you went into the housing at  
2 Windmill Drive?

3 A. I -- that was how I was placed in that  
4 housing, yes.

5 Q. And it's your opinion that the placement  
6 there was the result of some prejudice of the City  
7 of Virginia Beach?

8 A. No. What I was referring to was the  
9 abandonment of my family, being able to remain even  
10 on the program and subjected to, once again,  
11 homelessness within the City of Virginia Beach, is a  
12 great example.

13 Q. Help me understand what you mean by the  
14 abandonment. I don't understand that phrase as  
15 you're using it.

16 A. Okay. Well, whenever you're on a  
17 program within the City, the City gives you the  
18 details to said programs. You're required to follow  
19 certain guidelines, and as long as you follow those  
20 guidelines, it should be fair for anyone who is  
21 participating to remain on those programs. And,  
22 unfortunately, I was not afforded that opportunity  
23 because of my African American status. And...

24 Q. Your -- help me connect the program and  
25 the requirements to you being displaced because

1     you're African American. I don't understand how  
2     that can happen.

3             A.     Exactly. It's a violation of law.  
4     However, it happened to my family so I can only  
5     speak to what we've experienced. And the experience  
6     living in the city is very painful.

7             And so that's why I'm here today giving  
8     this deposition. To just speak to that.

9             Q.     So I'd ask you now to speak to it.  
10    Specifically, what happened at Windmill Drive that  
11    you believe was truly racist and prejudiced?

12            A.     The exclusion from being afforded the  
13    opportunity to even participate in said program.

14            Q.     But --

15            A.     Is the premise of my argument.

16            Q.     But I'm having difficulty understanding  
17    because you've testified today that you actually  
18    lived in the house. So help me understand where I'm  
19    not -- I'm not getting it.

20            A.     Yes. So that should have been a  
21    continuation of services. And said services was  
22    then stricken from my family because of my efforts  
23    to speak out against the apartheid system within the  
24    City.

25            Q.     What services were stricken from your

1 family?

2 A. Our housing specifically.

3 Q. So you were forced to move out of the  
4 Windmill Drive address?

5 A. We were -- we were placed -- or  
6 displaced from the program.

7 Q. Who in the City of Virginia Beach is  
8 responsible for administering that program, if you  
9 know?

10 A. I do not know.

11 Q. Did you call to express your concerns to  
12 the City of Virginia Beach?

13 A. I have expressed my concerns.

14 Q. I'm referring specifically to this  
15 incident at Windmill Drive. Did you call to express  
16 those concerns about your displacement from Windmill  
17 Drive to the City of Virginia Beach?

18 A. I have -- I answered it. I said I have  
19 expressed my concerns.

20 Q. Do you know which department you  
21 expressed those concerns to?

22 A. Housing.

23 Q. Do you recall anyone you would have  
24 spoken to at Housing?

25 A. I -- not off the top of my head, no.

1 Q. Did you call on the phone?

2 A. Yes.

3 Q. Did you ever send e-mails?

4 A. I don't recall. I don't recall.

5 Q. Were you assigned a case worker in that  
6 instance?

7 A. Yes.

8 Q. Who was your case worker?

9 A. I don't recall her name.

10 Q. You have no idea what her name is?

11 A. I don't recall, no.

12 Q. Do you have that name written down  
13 anywhere?

14 A. I'm sure I do.

15 Q. Where would that most likely be?

16 A. I don't -- I may -- I don't know. I may  
17 have an old card that she gave me I think some years  
18 back I can try to find.

19 Q. Which housing program were you in that  
20 you were assigned that case worker?

21 A. I don't recall the name specifically of  
22 the program, but it was through the City of Virginia  
23 Beach housing.

24 Q. Do you know if it was Section 8 housing?

25 A. That would have been the next step. I



1 don't recall, you know, what specifically it was.

2 Q. So if I understand you, you didn't get  
3 to Section 8 housing in the City of Virginia Beach?

4 A. Right.

5 Q. This Windmill Drive address, is that  
6 public housing?

7 A. I don't know what you mean by that.

8 Q. You were placed in that house by the  
9 City of Virginia Beach, correct?

10 A. I was in a program through the City of  
11 Virginia Beach, but it wasn't necessarily a  
12 placement.

13 Q. Let me ask it a different way. Did they  
14 provide you that address and say that this is the  
15 house that you've qualified for --

16 A. No.

17 Q. -- or are eligible for?

18 A. No.

19 Q. So you personally sought out this  
20 Windmill Drive address and the City of Virginia  
21 Beach was to reimburse you for expenses or partial  
22 expenses at that location?

23 A. Not reimburse but support. In the  
24 program we did get support to remain in the house.

25 Q. The Tuition Drive address, is that also

1 through public assistance?

2 A. No.

3 Q. After leaving the Windmill Drive address  
4 and then living at the Tuition Court address, are  
5 you still on any sort of public assistance  
6 personally?

7 A. As far as what?

8 Q. Any public services.

9 A. I do receive services for my children.

10 Q. Do you own or rent at Tuition Court?

11 A. Rent.

12 Q. Being unemployed for nine years and not  
13 receiving services for yourself, how do you pay for  
14 your rent?

15 A. Disability.

16 Q. I want to go back to your interaction  
17 with the NAACP and ask you if there were any other  
18 civic organizations that you've been a member of or  
19 participated in in the City of Virginia Beach?

20 A. I don't recall.

21 Q. Have you ever advocated for a ward or a  
22 district system before the City Council of the City  
23 of Virginia Beach?

24 A. What is the question?

25 Q. Have you ever advocated for a ward

1 system or a district system before the City Council  
2 of the City of Virginia Beach?

3 A. Not to my -- are you asking if I went to  
4 City Council?

5 Q. Yes, ma'am.

6 A. No. Not to my knowledge.

7 Q. You've never spoken at open mike or an  
8 agenda item before the City Council as to district  
9 or ward voting?

10 A. No.

11 Q. Prior to the filing of the lawsuit did  
12 you ever reach out to any Council member regarding  
13 your desire to change the City of Virginia Beach  
14 from the at-large system to the district or a ward  
15 system?

16 A. Not to my knowledge.

17 Q. Have you ever spoken to the Virginia  
18 Beach City Council on an issue of concern for you?

19 A. I don't recall. I don't recall.

20 Q. Did you ever participate in the  
21 redistricting that occurred following the 2010  
22 Census through the NAACP or otherwise?

23 A. Not to my knowledge.

24 Q. Have you ever been an advocate or a  
25 proponent of any other social issue in the last four

1 years before the City of Virginia Beach?

2 A. What do you mean?

3 Q. I'm asking you whether you -- you said  
4 you've never spoken to City Council in reference to  
5 the voting system in the City of Virginia Beach.  
6 And now I'm asking whether you've addressed City  
7 Council through your presentation, e-mail, or  
8 otherwise for any other issue in the last four  
9 years.

10 A. I don't recall.

11 Q. Have you ever participated on any of the  
12 City of Virginia Beach's boards or commissions?

13 A. Not to my knowledge.

14 Q. Have you ever participated as a  
15 volunteer for the City of Virginia Beach in any  
16 capacity?

17 A. I don't recall.

18 Q. Have you ever attended the Virginia  
19 Beach Human Rights Commission meetings?

20 A. I don't recall.

21 Q. That was a bit of an unfair question.  
22 Are you familiar with the Virginia Beach Human  
23 Rights Commission?

24 A. I've heard of that.

25 Q. Do you know if you have ever been to any

1 of their meetings?

2 A. I don't recall.

3 Q. Are you familiar with the Minority  
4 Business Council in Virginia Beach?

5 A. I do not -- I have no knowledge of that.

6 Q. Are you aware that there was a disparity  
7 study done in the City of Virginia Beach?

8 A. Oh, yes.

9 Q. Have you had the opportunity to review  
10 that disparity study yourself?

11 A. No.

12 Q. What is your understanding of how that  
13 disparity came to be?

14 A. I, you know, really don't know how  
15 the -- you're talking about the study itself?

16 Q. Yes, ma'am.

17 A. I don't know.

18 Q. Let me go briefly back to the Virginia  
19 Beach Human Rights Commission. Are you -- you said  
20 you were generally aware of that group. Is that  
21 fair?

22 A. I've heard of it.

23 Q. Do you know their mission?

24 A. No.

25 Q. Do you know who sits or serves on that

1 commission?

2 A. Not to my knowledge, no.

3 Q. Have you ever heard of Vision 2040?

4 A. No.

5 Q. Are you aware of the African American  
6 Cultural Center?

7 A. I've heard, but no, I have not.

8 Q. Do you have any involvement with the  
9 African American Cultural Center?

10 A. Not to my knowledge.

11 Q. Do you have any knowledge regarding the  
12 relationship between the City of Virginia Beach and  
13 the African American Cultural Center?

14 A. I don't recall.

15 Q. Are you familiar with the City Council  
16 candidate by the name of Aaron Rouse?

17 A. Yes.

18 Q. Can you tell me what you know about Mr.  
19 Rouse?

20 A. He's currently on Council.

21 Q. Do you know him to be an African  
22 American male from the Seatack neighborhood?

23 A. I do not know specifics about him.  
24 Personally.

25 Q. During the 2018 City Council election

1 did you understand him to be the African American  
2 preferred candidate?

3 MS. HARLESS: Objection to form.

4 You can answer.

5 A. I cannot speak to anyone else's, you  
6 know, involvement. I only knew his election was  
7 pretty much a special circumstance. That's all I  
8 really know.

9 BY MR. HARRIS:

10 Q. You say that with some certainty. Tell  
11 me what you mean by special circumstance.

12 A. Well, he was elected in this past  
13 election. So...

14 Q. Was there anything particular about his  
15 election that you would call special or was a  
16 special circumstance?

17 A. Yes. I do believe that his election was  
18 directly correlated with my complaint. In addition  
19 to Ms. Wooten. I believe it to be just a  
20 manipulation once again of the system. Because of  
21 my complaint specifically.

22 Q. So is it your testimony that the  
23 election of Aaron Rouse and Sabrina Wooten is in  
24 some way in response to your complaints to the City  
25 of Virginia Beach?

1 MS. HARLESS: Objection,  
2 mischaracterizes.

3 BY MR. HARRIS:

4 Q. You can answer.

5 A. I do believe that it is directly  
6 correlated with my complaint.

7 Q. Let me be clear. When you say  
8 "complaint," do you mean the formal complaint you  
9 filed with the federal court or some complaint you  
10 filed with a person in the City of Virginia Beach?

11 A. I would say specifically to my complaint  
12 filed with federal court pertaining to the at-large  
13 system.

14 Q. What leads you to that conclusion?

15 A. Because never before has the City of  
16 Virginia Beach had two minorities sitting on Council  
17 at one time, so it was just a special circumstance  
18 that this has occurred.

19 Q. You know him to be a standout football  
20 player in high school and college?

21 A. I do not know that.

22 Q. Did you know that he played in the NFL?

23 A. I think I've heard that, but I don't  
24 know for sure.

25 Q. Did you know that he got the highest



1 number of votes ever in the City of Virginia Beach?

2 A. No.

3 Q. Did you attend any campaign events for  
4 him?

5 A. No.

6 Q. Any reason to believe he's not otherwise  
7 a qualified and capable candidate?

8 A. I don't have anything to speak for or  
9 against him.

10 Q. Have you talked to anyone else that  
11 shares your opinion of this special circumstance of  
12 Aaron Rouse?

13 A. No.

14 Q. Do you have any information that would  
15 lead you to believe that the majority of the  
16 population in the City of Virginia Beach was even  
17 aware of your lawsuit?

18 A. Do I have any reason to believe? It's  
19 public knowledge. You can -- anyone can obtain that  
20 information.

21 Q. Did you ever hear any instances where  
22 current Council members were speaking publicly about  
23 your pro se filing?

24 A. I have heard certain Council persons  
25 address my desire for the ward system, yes.

1 Q. Let's talk about those. Which Council  
2 members were they?

3 A. That would be Moss, and that was just  
4 in -- on like a recording I saw that.

5 Q. Do you recall what he said?

6 A. He spoke to that it was an unjust system  
7 and that he did believe that it should be changed.

8 Q. Do you know where you watched that  
9 recording?

10 A. It was on the Internet.

11 Q. It's a big place.

12 A. Uh-huh.

13 Q. Do you know if it was the City of  
14 Virginia Beach website?

15 A. I don't recall what website it was. And  
16 even with Jessica Abbott's response to that, I don't  
17 recall what website that was either, but I do know  
18 that she made a response.

19 Q. Do you recall it being a formal setting  
20 in which they were providing these statements, or  
21 was this a -- you know, a Facebook video? Do you  
22 have any recollection of where these came from?

23 A. It appeared to be an interview. I can't  
24 speak to exactly what it was.

25 Q. Do they mention your lawsuit filing

1 specifically?

2 A. I don't recall.

3 Q. These statements by Moss and Abbott, was  
4 that in the same video or are we talking about  
5 separate videos?

6 A. I don't recall if Abbott's was a video.  
7 I just recall reading her response.

8 Q. Did you read that online?

9 A. Yes.

10 Q. Do you recall where you read it?

11 A. I do not. It was on the Internet.

12 Q. Do you use Facebook?

13 A. Sporadically. I don't really know how  
14 to use it very well, but yes.

15 Q. So it's possible that's a place you may  
16 have seen it?

17 A. I don't think so.

18 Q. Do you frequent the vbgov.com website  
19 often?

20 A. No. I can't say that I do.

21 Q. Do you frequent our local news site,  
22 websites frequently?

23 A. I don't frequent them, no.

24 Q. Let me ask it this way. Where do you  
25 get your news?

1           A.     From television, so it could have been  
2     on television. And sometimes you get the little  
3     news feed that pops up, you know, from the news  
4     interviews. So that's what it was, I believe. It  
5     was an interview, it looked like.

6           Q.     You've mentioned Councilman Moss and  
7     Councilman Abbott. Were there any other Council  
8     members you recall making statements that you  
9     perceived to be support for your lawsuit?

10          A.     I do not recall.

11          Q.     You referred to Aaron Rouse's election  
12     as a special circumstance and you also mentioned  
13     that Sabrina Wooten's election would also be  
14     considered a special circumstance in your mind?

15          A.     Yes.

16          Q.     Are the same reasons that you call it a  
17     special circumstance for Aaron Rouse --

18          A.     Yes.

19          Q.     -- they're the same reasons you would  
20     call it special circumstances for Sabrina Wooten?

21          A.     Yes.

22          Q.     Do you consider it generally a positive  
23     that the Virginia Beach City Council now contains  
24     two African Americans?

25          A.     I consider it a positive. However, that

1 has not been the experience and it has not been  
2 consistent throughout my lifetime. And before.

3 Q. Do you believe that Aaron Rouse is  
4 attentive to the needs of the African American  
5 community?

6 A. I can't speak to that.

7 Q. Do you believe that Sabrina Wooten is  
8 attentive to the needs of the African American  
9 community?

10 A. I can't -- I do not believe so, no. But  
11 I can't speak to that.

12 Q. Well, you said you do not believe so.  
13 I'm interested to know why.

14 A. You asked my opinion and I just gave it.

15 Q. What informs that opinion? What facts?

16 A. I just believe that their election was a  
17 manipulation of our current system to discredit my  
18 complaint. And I stand firmly on that belief. And  
19 my evidence is that prior to my complaint, that has  
20 never happened before. So that's my belief.

21 Q. Do you have any other facts or evidence  
22 that would inform that belief of manipulation of the  
23 system?

24 A. I do believe there are reports that are  
25 being presented to the courts that support such.

1 Q. Have you had an opportunity to review  
2 the reports that were presented to the courts?

3 A. No.

4 Q. I'm referring specifically now to  
5 experts retained in this case, the plaintiffs' case.  
6 Have you had an opportunity to review their reports?

7 A. No.

8 Q. Do you believe there's a lack of  
9 responsiveness on the parts of all elected officials  
10 to the needs of the African American community?

11 A. Absolutely.

12 Q. Can you tell me where those areas are?

13 A. I would say in every aspect of living  
14 within the City of Virginia Beach there is  
15 definitely a deficit in the representation of  
16 minorities. Again, it is an apartheid system, it is  
17 a system where the voices of the white individuals  
18 have a lot of representation. Unfortunately,  
19 minorities, they lack in the area of education, they  
20 lack in the area of employment, they lack in the  
21 area of housing, just straight across the board, in  
22 every aspect of living within the city. There's  
23 just a breakdown and it's -- it's painful being an  
24 African American living within the city to live  
25 within that breakdown.

1 Q. Is it your opinion that Hispanic  
2 Americans in Virginia Beach also suffer from those  
3 same breakdowns?

4 A. It is my opinion that all black and  
5 brown individuals, which is what I consider to be  
6 nonwhite, have experienced those breakdowns.

7 Q. Then you would include Asian Americans  
8 in that group of people who are suffering from the  
9 breakdowns that you've described?

10 A. I would include nonwhites, yes.

11 Q. Have you studied or researched the  
12 educational outcomes between these minority groups  
13 in the City of Virginia Beach?

14 A. I have delved a little into, you know,  
15 researching only for, you know, the benefit of  
16 persons with special education needs and things of  
17 that nature. And that's what I, you know, founded  
18 my complaint. That's how it initiated.

19 Q. You would agree that your initial  
20 complaint, however, did not include all minorities.  
21 Your initial complaint only included African  
22 Americans, correct?

23 A. I'm in support of what my complaint  
24 includes.

25 Q. Do you mean your amended complaint?

1           A.     My amended complaint. Yes. Because  
2     that's what apartheid is. It's the separation.

3           Q.     Do you agree with the statement that the  
4     City of Virginia Beach is an integrated city?

5           MS. HARLESS: Objection to form.

6           A.     I would not agree with that statement  
7     just on the mere fact that we've never had a person  
8     of color in a position of the captain of the police,  
9     we've never had a person of color in the position of  
10    superintendent of the schools, we've never had  
11    people of color in any positions that make decisions  
12    within the dynamics of our city. So I would  
13    challenge that.

14    BY MR. HARRIS:

15           Q.     What about geographically? Would you  
16    say that there are any concentrated areas of African  
17    Americans within the City of Virginia Beach?

18           A.     There absolutely are areas that are --  
19    have a large -- if you're talking about the dynamics  
20    within the city where minorities reside, and that's  
21    my argument.

22           Q.     Can you give me some examples of those  
23    predominantly minority neighborhoods?

24           A.     I would say most of the areas that you  
25    listed as my places of living, I am considered in



1     that population so, therefore, you can look back on  
2     those addresses.

3             Q.     Do you know any other neighborhoods?

4             A.     Not off the top of my head, but...

5             Q.     Do you know of any areas within the City  
6     of Virginia Beach that are of a high concentration  
7     of Hispanic Americans?

8             A.     Again, you could look at some of the  
9     same areas that you've already listed as my former  
10    places of residence.

11            Q.     What about any areas of high  
12    concentration of Asian Americans within the City of  
13    Virginia Beach?

14            A.     I -- I do not recall specifics.

15            Q.     You can't identify any neighborhoods  
16    that might be predominantly Asian?

17            A.     No.

18            Q.     We've been going for about an hour and a  
19    half. Do you mind if we take a five-minute break?

20                   MS. HARLESS: Let's take a break.

21                   (Recess)

22    BY MR. HARRIS:

23            Q.     Ms. Holloway, we're back on the record  
24    after a short break, and I wanted to clarify two  
25    points and then move on to my last line of questions

1 and then we'll let you go about the rest of your  
2 day.

3 This reference that was made to the  
4 apartheid system in the City of Virginia Beach, I  
5 heard you attributing that to your housing situation  
6 at Windmill Drive. We've talked about that. Do you  
7 know any other individuals by name who have sort of  
8 shared your experience?

9 A. Not to my knowledge.

10 Q. Other than in the housing department of  
11 the City of Virginia Beach have you experienced a,  
12 quote/unquote, apartheid system in other  
13 departments?

14 A. Absolutely.

15 Q. What departments are those?

16 A. Education. The current system is just  
17 an abomination. Minorities are once again  
18 underrepresented and they do not receive supports  
19 that they should be receiving while being educated  
20 in school. I --

21 Q. Let me -- before you go on -- I  
22 apologize for interrupting you. Before you go on,  
23 what types of services are minorities not getting in  
24 the City school system?

25 A. Well, I would start with just

1 identifying the needs of any individual if they have  
2 any types of disabilities. I would follow that up  
3 within the educational system that they are supposed  
4 to then be provided with said accommodations and,  
5 unfortunately, that is not my experience. My  
6 experience has been that the City of Virginia Beach,  
7 as a generalized method of working with minority  
8 children, has been conducting restraint, seclusions,  
9 mistreatments, you know, expulsions. It's just the  
10 pipeline from the educational setting straight into  
11 prisons. And it is just an abomination. And bottom  
12 line, we lack representation. Bottom line, that  
13 even when there are -- for example, in my case, even  
14 when there are complaints made, you know, they're  
15 dismissed.

16 Q. The circumstances you're describing at  
17 the City school system, is your opinion that this  
18 treatment is exclusive to minorities?

19 A. It is my opinion that this treatment is  
20 exclusive to minorities. Or -- or I should say the  
21 protected classes, I will say.

22 Q. What do you define as protected classes?

23 A. That, basically I was referring to race  
24 as the major portion of that statement.

25 Q. So would it be fair for me then to say

1 it's your opinion that the nonwhite students are the  
2 ones that are being subjected to this treatment in  
3 the City of Virginia Beach public school system?

4 A. That would be fair.

5 Q. Do you have any facts or evidence to  
6 support that opinion?

7 A. I can only go by the reports that the  
8 City of Virginia Beach provided to myself and other  
9 parents that have attended both School Board  
10 meetings as well as some of their additional  
11 meetings connected with the schools. So that was --  
12 that was from -- directly from the school. Not me  
13 just making it up.

14 Q. I'm not familiar with those reports.  
15 Can you tell me where they came from?

16 A. I don't have them with me, but I would  
17 definitely advise that you can check with the School  
18 Board because that's where I got my information  
19 from, and they expressed the number of minorities  
20 who are either expelled or excluded from said  
21 education. And so we're not just talking about the  
22 lack of providing interventions. We're talking  
23 about total exclusion where they're being placed in  
24 settings where they're not being educated. And so  
25 that's a major concern because -- I'm sorry. Go

1 ahead.

2 Q. Do those statistics, from your  
3 recollection, break down as white and nonwhite?

4 A. Yes.

5 Q. Or do they break down by racial group?

6 A. I don't recall them getting specific. I  
7 just recall in the meeting that it was the -- I  
8 can't even recall who was giving the presentation,  
9 but they expressed that minorities within the City  
10 of Virginia Beach are not graduating at the same  
11 level of their white counterparts. Not receiving  
12 services at the level of their white counterparts.  
13 Being placed in seclusion, being expelled from  
14 school. You know, whatever negative circumstances  
15 that could occur within a school, the minorities  
16 were receiving it at a higher rate than their white  
17 counterparts.

18 Q. And to be clear, when you say "the  
19 minorities," in all the circumstances you're  
20 referring to African American, Hispanic, Asian, and  
21 any other racial minority?

22 A. And again, I do not recall the breakdown  
23 of the City of Virginia Beach Public Schools'  
24 report. I just recall her expressing minorities in  
25 general. So I don't know what that breakdown

1 specifically was.

2 Q. Any other departments -- you've  
3 mentioned housing and education -- now that you  
4 would put the label of apartheid system on in the  
5 City of Virginia Beach?

6 A. Absolutely. You know, the City, from my  
7 recollection, expressed that they did not even  
8 require a disparity study because they were already  
9 aware of the disparities within the City pertaining  
10 to providing opportunities for, you know, business  
11 ownership within the City. Contracts, obtaining  
12 contracts within the City.

13 So every aspect within the City of  
14 Virginia Beach is -- it's just been, you know,  
15 hindrances that prevent individuals who are nonwhite  
16 from being able to grow and prosper or even to be  
17 able to participate at all.

18 Q. Is it your opinion that across the line  
19 there's no progress being made in these areas?

20 A. I would express my experience is that,  
21 you know, we have been subjected to an oppressive  
22 system that has not afforded the same as my white  
23 counterparts. That is my experience.

24 Q. Has there been any improvement that you  
25 can point to in those areas?

1           A.     I can't speak to that.

2           Q.     Because you're unaware of it or because  
3 you can't identify any areas where you can identify  
4 improvement by the City of Virginia Beach?

5           A.     I can't speak to that because my  
6 experience as living as an African American within  
7 the city has not been positive. It's been painful  
8 and it continues to be painful. As evidenced by,  
9 you know, my report to you that after I reported and  
10 expressed these things happening, we experienced  
11 retaliation.

12                     So that's also another means of the  
13 apartheid system, where the persons of power,  
14 instead of embracing, supporting, you know, being  
15 inclusive and trying to resolve said matters, their  
16 means of dealing with those types of complaints has  
17 been to retaliate.

18                     And so myself, I just -- I have to speak  
19 to that, regardless of what consequence the City  
20 will again press on me. I can only speak to my  
21 experiences, and that has been my experience.

22           Q.     Are you aware of any programs within the  
23 City of Virginia Beach that are seeking to improve  
24 the condition of living for African Americans in the  
25 City of Virginia Beach?

1           A.     Not to my knowledge.

2           Q.     Is it your opinion that the Mayor and  
3 the members of City Council do not have meaningful  
4 concern for the needs of the African American  
5 community?

6           A.     I would agree with that fact that they  
7 have not been -- they've -- as far as I'm concerned,  
8 from what I've experienced, they've been very  
9 dismissive and not until my complaint even came  
10 about did there become an interest in trying to  
11 throw their support behind a minority to be on City  
12 Council. That's alarming. That, to me, speaks to  
13 the special circumstances that we were talking about  
14 earlier.

15                   I just think this has been very painful  
16 to live within the city and continue to experience  
17 this year after year after year.

18           Q.     Are you aware that there was a previous  
19 referendum placed on the ballot to move to a ward  
20 system in Virginia Beach?

21           A.     I'm aware that there was talk of it and  
22 that's about as far as I know of, you know, what has  
23 happened in the past.

24                   But once again, when we're talking about  
25 an apartheid system, persons that are in power are



1 not in -- accustomed to relinquishing that power.  
2 And we're talking about myself as being a minority,  
3 there being an inequity, it's not equal. So persons  
4 like myself that are the minority have not had the  
5 opportunity to be -- to live in an environment where  
6 their needs would be even met. Because those  
7 persons in power, they're not in the business of  
8 giving up that power.

9 So if you're suggesting that there was  
10 any type of vote where those persons were given  
11 opportunities to decide whether there should be an  
12 equitable system or not, and that vote was voted  
13 down, that would only, to me, support my argument  
14 that, you know, this is an apartheid system. It  
15 should be equal. We all should have a seat at the  
16 table. And as it stands right now, that is not my  
17 experience. That is not the experience of any of  
18 the minorities within the city.

19 Q. You're speaking on behalf of all  
20 minorities. Which I'm now taking from your  
21 deposition testimony to mean anyone who's not white.  
22 Is that right?

23 A. Nonwhites.

24 Q. And when you talk about this shared  
25 experience, have you spoken to anybody specifically

1 that agrees with you on these points?

2 A. I watch the news and I hear, you know,  
3 some of these complaints being made within the news,  
4 especially with the toxicity within the City.  
5 That's what the toxicity is. It is an inequitable  
6 system. It is painful not only, you know, to blacks  
7 but to other minorities. Black and brown  
8 individuals are not afforded the same opportunities  
9 as their white counterparts. So that's what, you  
10 know, my complaint is.

11 Q. Would you agree with the statement that  
12 there has been some progress in achieving more  
13 minority representation on City Council in the last  
14 ten years?

15 A. I would not.

16 Q. You do not agree with that statement?

17 A. I believe if you're referring to the  
18 current two minorities on City Council, I have  
19 expressed to you already that I absolutely believe  
20 that to be a manipulation of our system that has  
21 caused, for me, what I can see as far as I can --  
22 I'm concerned, it is special circumstance. It has  
23 never in history happened before. It only happened  
24 as a direct consequence of my complaint. Never  
25 before did any persons of -- white individuals have

1 any interest in throwing their interest behind  
2 minority Council persons. So it's just -- you know,  
3 it's a little alarming to me that that only happened  
4 after my complaint.

5 Q. Have you reviewed election results  
6 related to 2016 or 2012 for Dr. Amelia Ross-Hammond?

7 A. I have obtained election results. I do  
8 not recall them. I just don't recall. And I would  
9 say the important fact remains that she was not  
10 reelected.

11 Q. She was elected in 2012, I believe. And  
12 then was not reelected in 2016. Is that the point  
13 you're making about her not being reelected?

14 A. Exactly.

15 Q. Is it your opinion that a minority  
16 candidate of choice cannot be a white individual?

17 MS. HARLESS: Objection to form.

18 A. I never said that. I...

19 BY MR. HARRIS:

20 Q. Don't misunderstand. I'm not trying to  
21 characterize any of your prior testimony. This is a  
22 new question. My question is, is it your opinion  
23 that a minority candidate of choice cannot be a  
24 white individual?

25 MS. HARLESS: Objection to form.

1           A.     Again, I never said that.

2     BY MR. HARRIS:

3           Q.     I'm not accusing you of having said  
4     that. I'm asking you if that is your opinion.

5           A.     I -- I would speak to -- I wouldn't  
6     speak to -- I would speak to basically the interest  
7     of that individual. We're talking about  
8     representation here. And the interest of that  
9     individual is what I'm more concerned about.

10          Q.     Rather than -- as opposed to the race of  
11     that individual?

12          A.     I wouldn't say that. I'm using race  
13     only as a fact. It is a fact. That in a hundred --  
14     over 111 years there's only been what, six  
15     minorities were on the City Council within the City  
16     of Virginia Beach. That's a fact. Another fact.  
17     They've never been reelected. That's a fact. So  
18     I'm not speaking necessarily to when you're  
19     referring to the specific persons that minorities  
20     would be interested in. I can't speak to that.

21          Q.     You said 111 years. What date are you  
22     going back to?

23          A.     I'm going back to the -- I had pulled  
24     some records at one point in my research in  
25     preparing my original complaint and that's what I

1 had come up with.

2 Q. For the Moss and Abbott video -- and I'm  
3 not going to belabor this point -- do you know even  
4 about when you would have watched this video?

5 A. I don't. I know it was a couple of  
6 years ago.

7 Q. Do you know if your complaint, your  
8 lawsuit, had been filed at the point that you were  
9 able to watch that video?

10 A. I believe so.

11 Q. And did I understand your testimony from  
12 earlier to be you can't recall whether they  
13 specifically discussed the lawsuit in that video?

14 A. I do not recall the specifics of the  
15 interviews, and I apologize.

16 Q. Are you familiar with a candidate Furman  
17 who ran for City Council in 2012, 2016, and 2014?

18 A. Not to my knowledge.

19 Q. Did you support the candidacy of Georgia  
20 Allen when she ran for City Council in 2008?

21 A. I do not recall.

22 Q. Do you know an individual by the name of  
23 Louisa Strayhorn?

24 A. It sounds familiar. And I apologize. I  
25 do not recall.

1 Q. Do you know an individual by the name of  
2 John L. Perry?

3 A. Not to my knowledge.

4 Q. Do you know an individual by the name of  
5 Ron Villanueva?

6 A. Okay. Yes. Uh-huh. I don't know him,  
7 but I've seen him on TV.

8 Q. Do you know him to be an Asian American  
9 who ran for City Council in 2002?

10 A. I believe. But I don't recall his  
11 specifics right off the top of my head.

12 Q. Do you know an individual by the name of  
13 Prescott Sherrod?

14 A. I do not recall.

15 Q. Do you know an individual by the name of  
16 Beatriz Amberman?

17 A. I do not recall.

18 Q. Do you know an individual by the name of  
19 Alicia Bobulinski?

20 A. I do not recall.

21 Q. Do you know an individual by the name of  
22 Dr. Veronica Coleman?

23 A. I do not recall.

24 Q. Do you know an individual by the name of  
25 Andrew Jackson?

1           A.     I do not recall.

2           Q.     Do you know an individual by the name of  
3     Shewling Moy?

4           A.     I do not recall.

5           Q.     Do you know an individual by the name of  
6     Teresa Stanley?

7           A.     I do not recall.

8           Q.     Do you know an individual by the name of  
9     Edna Hawkins-Hendrix?

10          A.     I do not recall.

11          Q.     Do you know an individual by the name of  
12     James Allen?

13          A.     I do not recall.

14          Q.     Do you know an individual by the name of  
15     Carl Wright?

16          A.     I do not recall.

17          Q.     Do you know an individual by the name of  
18     John Bell?

19          A.     I do not recall.

20          Q.     Do you know an individual by the name of  
21     Gary McCollum?

22          A.     Oh, yes.

23          Q.     How do you know Gary McCollum?

24          A.     I -- he -- he ran for office.

25          Q.     Here in the City of Virginia Beach?

1 A. Yes.

2 Q. Do you know which office he ran for?

3 A. I don't -- I don't recall which office,  
4 but I know he ran for something. I apologize.

5 Q. Have you spoken to him during the  
6 pendency of this lawsuit?

7 A. In passing. He -- yes.

8 Q. Tell me about that conversation.

9 A. He -- I once again -- I oftentimes when  
10 I meet people will express: I need help. And he  
11 did offer to help.

12 Q. In what way?

13 A. He offered to let -- to find out if he  
14 had a friend or someone that could help me. As far  
15 as the case is concerned.

16 Q. There are two cases so let's -- which --  
17 did you ask him for help with a specific case or  
18 both cases?

19 A. That would be this -- this case.

20 Q. Did he make any comments about this case  
21 or his support for it?

22 A. No. He didn't. We didn't specifically  
23 talk regarding that. It was more so in passing.  
24 You know: I think I have someone that might be able  
25 to help you.



1 And that was pretty much the gist of it.

2 Q. Do you know an individual by the name of  
3 Seko Varner?

4 A. No, I can't say. I don't recall.

5 Q. Do you know an individual by the name of  
6 Elizabeth Mills?

7 A. I don't recall.

8 Q. Do you know an individual by the name of  
9 Tanya Bullock?

10 A. That does sound familiar. I don't  
11 recall. I'm sorry. I'm so sorry.

12 Q. Do you know an individual by the name of  
13 Jose Flores?

14 A. I don't recall.

15 Q. Do you know an individual by the name of  
16 James Cabiness?

17 A. I don't recall.

18 Q. Do you know anyone by the name of Shaun  
19 Brown?

20 A. I do recall, yes.

21 Q. Who is Shaun Brown?

22 A. She is the person who invited me to  
23 attend, it was like a -- like a conference. To tell  
24 my story. So...

25 Q. When did that happen?

1           A.     Oh, gosh. That was at least two years  
2 ago. At least.

3           Q.     Where was the conference held?

4           A.     It was here in Virginia Beach. I don't  
5 remember in fact where it was, but it was here.

6           Q.     You remember what the purpose of the  
7 conference was?

8           A.     It was something she was affiliated  
9 with, and she had seen my son's story and just  
10 invited me.

11          Q.     To be clear, your son's story is also  
12 part of the other lawsuit that's now pending in  
13 federal court; is that right? This is the same son,  
14 is what I'm asking.

15          A.     Yes.

16          Q.     Other than the names of individuals that  
17 we've discussed during the course of your deposition  
18 today, are you familiar with or do you have the  
19 names of any other individuals who might have  
20 information related to your claims in this lawsuit?

21          A.     I apologize, but I don't. Not to my  
22 knowledge. Nothing comes to mind.

23          Q.     Ms. Holloway, I thank you for your  
24 patience with me today and I thank you for your  
25 time. I don't have any more questions for you.

1           A.       And I apologize again. I'd laugh and I  
2       told them, I was like, Are they sure they want me?  
3       Don't they know my memory?

4           So I apologize again. I just -- I have  
5       the worst memory.

6           MS. HARLESS: No questions for me.

7           THE DEPONENT: Thank you for having me.

8           MR. HARRIS: Thank you.

9           (Signature not waived.)

10          (The deposition was concluded at  
11          4:02 p.m.)



## 1 CERTIFICATE OF DEPONENT

2 COMMONWEALTH OF VIRGINIA

3 CITY OF \_\_\_\_\_

4

5

6 Before me, this day, personally appeared  
7 Latasha M. Holloway, who, being duly sworn, states  
8 that the foregoing transcript of this deposition,  
9 taken in the matter, on the date and at the place  
10 set out on the title page hereof, constitutes a true  
11 and complete transcript of said deposition.

9

10

-----  
Latasha M. Holloway

11

12

13

14 SUBSCRIBED and SWORN to before me this \_\_\_\_\_  
15 day of \_\_\_\_\_, 2019, in the jurisdiction  
16 aforesaid.

15

16

17

18 \_\_\_\_\_  
My Commission Expires Notary Public

19

20

21

22

23

24

25

1 COMMONWEALTH OF VIRGINIA at large, to wit:

2 I, Juanita Harris Schar, CCR, RMR, CRR,  
3 a Notary Public for the Commonwealth of Virginia at  
4 large, of qualification in the Circuit Court of the  
5 City of Virginia Beach, Virginia, and whose  
6 commission expires April 30, 2022, do hereby certify  
7 that the within named deponent, LATASHA M. HOLLOWAY,  
8 appeared before me at Virginia Beach, Virginia, as  
9 hereinbefore set forth, and after being first duly  
10 sworn by me, was thereupon examined upon her oath by  
11 counsel for the respective parties; that such  
12 examination was recorded in Stenotype by me and  
13 reduced to computer printout under my direction; and  
14 that the foregoing constitutes a true, accurate, and  
15 complete transcript of such examination to the best  
16 of my ability.

17 I further certify that I am not related  
18 to nor otherwise associated with any counsel or  
19 party to this proceeding, nor otherwise interested  
20 in the event thereof.

21 Given under my hand and notarial seal  
22 this 16th day of September, 2019, at Virginia Beach,  
23 Virginia.

24 -----  
25 Notary Public

Certified Court Reporter No. 0313085

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